

From: Blanco-Gonzalez, Joel
Sent: Wednesday, March 13, 2013 10:45 AM
To: Ateyeh, Laurel <lateyeh@pa.gov>
Cc: MacKnight, Evelyn <MacKnight.Evelyn@epa.gov>; Trulear, Brian <Trulear.Brian@epa.gov>; Patel, Pravin <prpatel@pa.gov>
Subject: Draft Permit Comments - Bucks County Water & Sewer Authority - PA0021181

Laurel,

Draft Permit: Bucks County Water & Sewer Authority
NPDES ID: PA0021181
EPA Received: February 12, 2013

Per our (Pravin Patel and Joel Blanco-Gonzalez) phone conversation on March 8, 2013 and based on PADEP's March 8, 2013 email correspondence, we have the following comments:

We received the draft permit for Bucks County Water & Sewer Authority on February 12, 2013. Our records show that this is a major municipal permit which discharges to Neshaminy Basin. Originally, we received a copy of a draft permit on November 8, 2010 and sent comments on December 8, 2010. In accordance with our December 8, 2010 review and comments, the facility Whole Effluent Toxicity Test (WETT) results failed (2 out of 5 testing results provided). Therefore, as an alternative, the draft permit should include WETT requirements upon permit reissuance. We recommended that an increased testing should be implemented and immediate back-to-back retesting should be performed to verify if any reasonable potential toxic such as lethal or sublethal is present in the facility performance.

The draft permit as written requires the permittee to conduct chronic WETT, including a Toxicity Reduction Evaluation (TRE) upon permit reissuance. According to PADEP's March 8, 2013, PADEP provided a justification on how the new WETT testing requirements set forth in Parts A(I)(A) and C(II) were determined (i.e., Best Professional Judgment (BPJ) and Standard Operating Procedure (SOP)). Furthermore, PADEP committed to add this justification in the fact sheet pursuant to 40 CFR § 124.28(b).

Please address the above comments and provide us with any changes to the draft permit and/or fact sheet.

If you have any questions concerning this matter, please let me know.

Thanks

Joel Blanco-Gonzalez
NPDES Permits Branch (3WP41)
Office of Permits and Enforcement
Water Protection Division | U.S. EPA Region 3
1650 Arch Street | Philadelphia, PA 19103 - 2029
Phone: (215) 814 - 2768 | Fax: (215) 814 - 2302
Email: blanco-gonzalez.joel@epa.gov